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8 **UNITED STATES DISTRICT COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA**

10 **IN RE: SOCIAL MEDIA ADOLESCENT**  
11 **ADDICTION/PERSONAL INJURY**  
12 **PRODUCTS LIABILITY LITIGATION**

Case No. 4:22-md-03047-YGR  
MDL No. 3047

13 This Document Relates to:

14 *Charleston County School District v. Meta*  
15 *Platforms Inc., et al.*

16 *Case No.: 4:23-cv-04659-YGR*

**DECLARATION OF ESTHER**  
**BEREZOFSKY IN SUPPORT OF**  
**PLAINTIFFS' OPPOSITION TO**  
**DEFENDANTS' MOTION FOR**  
**SUMMARY JUDGMENT**  
**(CHARLESTON) (SD MSJ No. 3)**

Judge: Hon. Yvonne Gonzalez Rogers  
Magistrate Judge: Hon. Peter H. Kang

17 I, Esther Berezofsky, of full age and duly sworn according to law, declare:

18 I am an attorney-at-law admitted to the bars of the State of New Jersey and Commonwealth  
19 of Pennsylvania. I am also admitted to practice in the U.S. District Court for the District of New  
20 Jersey, U.S. District Court for the Eastern District of Pennsylvania, U.S. District Court for the  
21 Eastern District of Michigan, U.S. District Court for the Western District of Michigan, the U.S.  
22 District Court for the Northern District of New York, the U.S. Court of Appeals for the 2<sup>nd</sup> and 3<sup>rd</sup>  
23 Circuits, and the United States Supreme Court. I am a member of the Motley Rice LLC law firm  
24 and represent plaintiffs in the above-captioned matter. I have personal knowledge of the facts set  
25 forth in this declaration, and if called to testify, I could and would be able to testify competently  
26 thereto.

1           1.       Attached hereto as **Exhibit 1** is a true and correct copy of Vol. I of the Deposition of  
2 Superintendent Anita W. Huggins taken on May 13, 2025.

3           2.       Attached hereto as **Exhibit 2** is a true and correct copy of the Affidavit of Lisa  
4 Kathryn Allison dated May 15, 2025.

5           3.       Attached hereto as **Exhibit 3** is a true and correct copy of the transcript of the  
6 30(b)(6) Deposition of Daniel Prentice taken on May 2, 2025.

7           4.       Attached hereto as **Exhibit 4** is a true and correct copy of the transcript of the  
8 Deposition of Associate Superintendent of High Schools, Sherry M. Eppelsheimer, Ed.D. taken on  
9 April 7, 2025.

10          5.       Attached hereto as **Exhibit 5** is a true and correct copy of the transcript of the  
11 30(b)(6) Deposition of Shavonna Coakley taken on April 1, 2025.

12          6.       Attached hereto as **Exhibit 6** is a true and correct copy of the transcript of the  
13 30(b)(6) Deposition of Lisa Katherine Allison taken on April 3, 2025.

14          7.       Attached hereto as **Exhibit 7** is a true and correct copy of the transcript of the  
15 Deposition of Ellen Bevill Nitz taken on April 4, 2025.

16          8.       Attached hereto as **Exhibit 8** is a true and correct copy of the transcript of the  
17 Deposition of Shavonna Coakley taken on April 1, 2025.

18          9.       Attached hereto as **Exhibit 9** is a true and correct copy of the transcript of the  
19 30(b)(6) Deposition of Executive Associate of Information Technology, Kenneth L. Buckheister  
20 taken on April 30, 2025.

21          10.      Attached hereto as **Exhibit 10** is a true and correct copy of an email chain between  
22 Lacy Bryant – M.Ed., Thomas Nawrocki, RCDD/RTPM and Michelle Conner, Principal from  
23 March 1 to March 2, 2022 Bate stamped MR\_CCSD\_573851-857.

24          11.      Attached hereto as **Exhibit 11** is a true and correct copy of the transcript of Vol. II of  
25 the Deposition of Lisa K. Allison taken on June 20, 2025.

26          12.      Attached hereto as **Exhibit 12** is a true and correct copy of the Affidavit of Daniel  
27 Prentice dated May 14, 2025.

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